

JACOBSON & FELLOWS

90 Conz Street
P.O. Box 597
Northampton, MA 01061
(413) 584-8181

Myles Jacobson, Attorney
Michael J. Fellows, Attorney

November 15, 2005

BY FAX (413) 785-0394 AND MAIL
AUSA Todd Newhouse
Federal Building and Courthouse
1550 Main Street, Room #310
Springfield, MA 01103

Re: United States of America v. Julio Marin, Criminal Action No. 05-30039-MAP
Discovery Letter (non-motion)

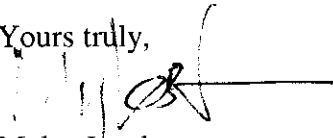
Dear Attorney Newhouse:

Pursuant to Fed.R.Crim.P. 16(a)(1)(G) this is to request a written summary of the testimony of each expert witness the government intends on using in Marin's trial in its case-in-chief. In this summary, for each, please describe: (1) the witness' opinions, (2) the bases and the reasons for those opinions, and (3) the witness' qualifications.

Please note that, in keeping with Rule 16 Advisory Committee Notes, this summary should (1) provide the defendant with a fair opportunity to test the merit of the expert's testimony through focused cross-examination, (2) inform the defendant whether the expert will be providing only background information on a particular issue or whether the witness will actually offer an opinion, (3) cover not only written and oral reports, tests, reports, and investigations, but any information that might be recognized as a legitimate basis for an opinion under Federal Rule of Evidence 703, including opinions of other experts, and (4) include both scientific and nonscientific experts. See, Advisory Committee Notes 1993 Amendment to Rule 16(a)(1)(E) (later renumbered as 16(a)(1)(G)).

Thank you.

Yours truly,


Myles Jacobson

cc.: Clerk, United States District Court (by mail only)